

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**COALITION PLAINTIFFS' NOTICE OF FILING DOCUMENTS FOR
AUGUST 5, 2020 HEARING**

Coalition Plaintiffs file this Notice to submit the attached documentary evidence to aid the discussion relating to adjudicated ballot images in Paragraph 2 of the Court's August 5, 2020 Order (Doc. 762).

Exhibit 1 is a page from Doc. 640-1.

Exhibit 2 is from a published article in the New York Times.

Further information on these attachments will be provided by counsel during the hearing.

This Notice has been prepared in accordance with the requirements of LR 5.1 and served on all counsel via the PACER-ECF system.

This 5th day of August, 2020.

/s/ Bruce P. Brown

Bruce P. Brown

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Governance*

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Audit Mark

Every single ballot in the election is imaged and appended with Dominion's patented AuditMark, a record of how the system interpreted the voter's selections. This ballot-level audit trail allows election officials and other stakeholders to review not only the ballot images, but also the tabulator's interpretation of each ballot.

Each image is labeled with the tabulator, batch, and sequence number within the batch, which corresponds to the physical ballot in the stack. The AuditMark is appended directly to the image showing how the vote was interpreted at scan time. This AuditMark will also include any adjudications applied to the ballot for voter intent. Even if ballots for a given batch are mixed after scanning, these multiple records provide a way of correlating the digital Cast Vote Record data to the image scanned and finally to the physical paper ballot. While the AuditMark allows ballot-level auditing, it is never tied to the voter.

Dual Threshold

When a hand-marked ballot is scanned by an ImageCast tabulator – at the precinct level or centrally – a complete duplex image is created and then analyzed for tabulation by evaluating the pixel count of a voter mark. The pixel count of each mark is compared with two thresholds (which are customer configurable, to determine what constitutes a vote.

If a mark falls above the upper threshold, it is determined to be a valid vote. If a mark falls below the lower threshold, it will not be counted as a vote. However, if a mark falls between the two thresholds (known as the “ambiguous zone”), it will be deemed as a marginal mark and the ballot will be returned to the voter for corrective action.

With this feature, the voter is given the ability to determine their intent at the time they cast their ballot, not an inspection or recount board after the fact, when it is too late. The chart below

00002_00001_000001.tif scanned at 14:51:37 on 02/09/14

Scanned on ICC Tabulator 1
Ballot ID: 2
GOVERNOR
Vote for AMELIA EARHART
SUPERVISOR DISTRICT 1
Vote for VINCENT PRICE
MAYOR OF CENTRAL CITY
Vote for MARY BAILEY
GOVERNING BOARD MEMBER
BLANK VOTE
"Adjudicated* Vote Accepted for
THOMAS EDISON

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17th
Georgia

Should every Georgian that has served their sentence for a crime they committed be allowed to have their voting rights restored?

☒ YES

☐ NO

NONPARTISAN GENERAL ELECTION

**For Justice,
Supreme Court of Georgia
(To Succeed Charlie Bethel)
(Vote for One)**

☒ Elizabeth "Beth" Beskin

☐ Charlie Bethel
(Incumbent)

☐ Write-in _____

**For Justice,
Supreme Court of Georgia
(To Succeed Sarah Hawkins Warren)
(Vote for One)**

☐ Hal Moroz

☒ Sarah Hawkins Warren
(Incumbent)